



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



## **Federally Enforceable District Origin Operating Permit (FEDOOP)**

Permit No.: O-0145-19-F

Plant ID: 0145

Effective Date: 07/16/2019

Expiration Date: 07/31/2024

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: **Rogers Group, Inc**  
13400 Old Henry Road  
Louisville, KY 40223

Owner: **Rogers Group, Inc**  
421 Great Circle Road  
Nashville, TN 37228

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve (12) months and no later than ninety (90) days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM<sub>10</sub>  
Tons/year: <25

Application No.: See **Application and Related Documents** table.  
Public Notice Date: 06/13/2019

Permit writer: Aaron DeWitt

A handwritten signature in blue ink, appearing to read "Matt K.", is positioned above the title of the Air Pollution Control Officer.

Air Pollution Control Officer  
7/16/2019

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**FEDOOP Permit Revisions/Changes**

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
27662-14-F	06/27/2014	07/30/2014	Initial	Initial Issuance
27662-14-F(R1)	01/31/2017	03/06/2017	Admin.	Added dust control plan. Addition of Plantwide section. Update to General Condition 12 & document submission address. Updates to Acronyms and Abbreviations list. Update to Preamble.
			Signif.	Update to General Condition 10, removal of greenhouse gas limits.
O-0145-19-F	06/13/2019	07/16/2019	Renewal	-Scheduled permit renewal. -Incorporation of construction permit C-0145-1000-19-F. -Addition of 3 conveyors (TC28, TC29, and TC6a. IA)

**Construction Permit Summary**

Permit No.	Issue Date	Description
83-05-C	2006	One (1) crushed stone processing operation with wet suppression system for control of PM emissions
221-91-C	1991	One (1) 20,000 diesel tank and one (1) 560 unleaded gasoline tank
282-89-C	1989	Jaw crusher, Pioneer 42 x 48, conveyor belts, and 6 x 16 screen and conveyor belt and wet suppression system
283-89-C	1989	Impact crusher, Universal Model 150 x 150, conveyor belt, and screens, 40 x 30 and 6 x 20, and wet suppression system
284-89-C	1989	Roll crusher, Pioneer Model 40 x 30, wet suppression system
355-95-C	1995	Pug mill, Eagle Model No. W044119-01, fed from 36" conveyor
106-98-C	1998	Wash plant
44-00-C	2000	Nonmetallic mineral processing feeders, weighing, loading, storage, and conveying of limestone from the underground stone quarry
F-13-1001-C (R1)	3/7/2014	Three (3) replacement screens: NES CO 8x20 TC Scalping Screen SC1 (1,000 ton/hr), NESCO 8x24 TS Sizing Screen SC2 (500 tons/hr), NESCO 8x24 TD Finishing Screen SC3 (400 tons/hr), and Transfer Conveyor TC27 (200 tons/hr).
C-0145-1000-19-F	6/11/2019	Add underground equipment

### Application and Related Documents

Document Number	Date	Description
97382	02/28/2019	District issued reminder for renewal application deadline of 4/31/2019
97502	03/07/2019	Rogers Group submittal of renewal/construction application
97507	03/07/2019	Rogers Group submittal of 100a with RO signature and corrected to check both construction and renewal application boxes
97518	03/08/2019	District question regarding fees
97524	03/08/2019	Rogers Group response to question regarding fees
97664	03/20/2019	District request for clarification of crusher CR3
97670	03/21/2019	Rogers Group request to remove CR3 from permit because the equipment is located underground
97671	03/21/2019	District follow-up that CR3 would still be permitted under Reg. 7.08 even if underground
97672	03/21/2019	Rogers Group clarifies that CR3 is not the crusher that is underground, but would still like it removed from permit
97673	03/21/2019	District follow-up for clarification of CR3. Request for letter from 2005 exempting emissions of underground equipment from permitting. District request for site visit.
97824	4/1/2019	Site visit date confirmation.
98073	04/17/2019	District follow-up to site visit and request for application.
98148	4/19/2019	Rogers Group application update 100b, 100c & attachments
98157	4/19/2019	District follow-up questions on application update
98158	4/19/2019	Rogers Group response to questions
98346	5/7/2019	District request for application of parts washer
98446	5/14/2019	Rogers Group parts washer application

## Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
(M)SDS	- (Material) Safety Data Sheet
MM	- Million
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

### **Preamble**

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

### **General Conditions**

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result

in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
  - The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<b><u>Reporting Period</u></b>	<b><u>Report Due Date</u></b>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year



G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards And Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.04	Construction or Modification of Major Sources in or Impacting Upon Non-Attainment Areas (Emission Offset Requirements)
2.05	Prevention of Significant Deterioration
2.06	Permit Requirements – Other Sources
2.07	Public Notification for Title V, PSD, and Other Offset Permits; SIP Revisions; and Use of Emission Reduction Credits
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
701 W. Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137***

**Plantwide Requirements****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.14	Control of Fugitive Particulate Emissions	2.4
2.17	Federally Enforceable District Origin Operating Permits	1 through 9

## Plantwide Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. PM/PM<sub>10</sub>

- i. The owner or operator shall not allow or cause total plantwide PM<sub>10</sub> emissions to equal or exceed 25 tons during any consecutive 12-month period.<sup>1</sup> [Regulation 2.17, section 5.1] [Regulation 5.00]
- ii. The owner or operator shall not allow or cause total plantwide PM emissions to equal or exceed 25 tons during any consecutive 12-month period.<sup>2</sup> [Regulation 5.00]
- iii. No owner or operator shall cause or permit the discharge of visible fugitive emissions beyond the lot line of the property on which the emissions originate. [Regulation 1.14, section 2.4] (Permit 83-05-C, Effective 2/1/2006)
- iv. The wet suppression system must be applied at all locations in the crushed stone processing operations as necessary to comply with the PM emission standards and limits specified in this permit. (Permit 83-05-C, Effective 2/1/2006)
- v. The wet suppression system shall be operated and maintained in good working order to effectively control the emissions of PM. (Permit 83-05-C, Effective 2/1/2006)
- vi. The owner or operator shall not allow any materials to be handled, transported or stored; or access roads to and from the plant site, roads on the plant site property and the on-site work areas of the plant site, to be used without taking reasonable precautions to prevent particulate matter from becoming airborne beyond the work site, as specified in the Fugitive Dust Control Plan or other plan as approved by the District. [Reg. 1.14, section 2.1] (Off-Permit Documents)

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<sup>1</sup> The source is potentially major for PM<sub>10</sub>. The source accepted less than 25 tpy for PM<sub>10</sub> as FEDOOP limits and to avoid being subject to the District STAR regulations.

<sup>2</sup> The source accepted less than 25 tpy for PM to avoid being subject to the District STAR regulations.

**S2. Monitoring and Record Keeping**

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of 5 years and make the records readily available to the District upon request.

**a. PM/PM<sub>10</sub>**

- i. The owner or operator shall, monthly, calculate and record the plantwide total emissions for PM and PM<sub>10</sub> for each month and 12-consecutive month period.

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

**a. PM/PM<sub>10</sub>**

- i. The owner or operator shall report the plantwide total emissions for PM and PM<sub>10</sub> for each month and 12-consecutive month period.

**Emission Unit U1: Limestone Crushing Plant****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.14	Control of Fugitive Particulate Emissions	2.4
7.08	Standards of Performance for New Process Operations	1, 2, 3.1.1, 3.3.1
40 CFR 60 OOO	Standards of Performance for Nonmetallic Mineral Processing Plants	60.670 – 60.676

<b>DISTRICT-ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.02	Adoption of Federal New Source Performance Standards	1 through 3

**Equipment<sup>3</sup>**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
TC1, TC2	Two (2) Transfer Conveyors, 1,000 ton per hour each	2005	1.14, 7.08, 7.02, 40 CFR 60 Subpart OOO	C1	Fugitive
TC5	One (1) Transfer Conveyor, 500 ton per hour each	2005			
TC3, TC4	Two (2) Transfer Conveyors, 300 ton per hour each	2005			
TC6, TC6a, TC7- TC10, TC12- TC21, TC27- TC29	Nineteen (19) Transfer Conveyors, 200 ton per hour each	2014			
TC11, WC-2, <sup>4</sup> WC-3	Three (3) Transfer Conveyors, 150 ton per hour each	2005			

<sup>3</sup> TC6a, TC28, and TC29 were left out of the previous operating permit application for 27662-14-F(R1). These conveyors are IA, therefore a construction permit is not required.

<sup>4</sup> The 'WC-#' conveyors and Wash Screen are water saturated and don't generate PM.

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
WC-1, TC22, TC23	Three (3) Transfer Conveyors, 100 ton per hour each	2005			
TC24-TC26	Three (3) Transfer Conveyors, 50 ton per hour each	2005			
SC1	Scalping Screen, 1,000 ton per hour	2013			
SC2	6'x20' TD Finishing Screen, 500 ton per hour	2013			
SC3	6'x20' TD Finishing Screen, 400 ton per hour	2013			
SC5	Wash Screen, 200 ton per hour	2005			
SC6	6'x20' Bivi-Tec Screen, 150 ton per hour	2005			
CR1	Secondary/Tertiary Crusher, 400 ton per hour	2005			
CR2	Secondary/Tertiary Crusher, 200 ton per hour each	2005			
B1-B10	Storage bins, 100 ton per hour each	2005			

### Control Devices

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>
C1	Wet suppression system	90%

## U1 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. Opacity

- i. The owner or operator shall not allow or cause visible emissions to exceed 7% opacity from Emission Processes, SC1, SC2, SC3 and TC27. [40 CFR 60.672(b)]
- ii. The owner or operator shall not allow or cause visible emissions to exceed 15% opacity from each crusher (CR1, CR2, CR3). [40 CFR 60.672(b)]
- iii. The owner or operator shall not allow or cause visible emissions to exceed 10% opacity from any other affected facility. Affected facilities include grinding mills, screening operations, bagging operations, buckets elevators, conveyors, storage bins, and enclosed truck or railcar loading station. [40 CFR 60.672(b)]
- iv. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate an affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 60.11(d)]

#### b. PM/PM<sub>10</sub>

- i. See Plantwide Emission Unit.
- ii. The owner or operator shall not allow PM emissions to exceed the following pound per hour standards for each piece of equipment based on actual operating hours in a calendar day. See Table 1.<sup>5</sup>  
[Regulation 7.08, section 3.1.2]

**Table 1 – Limestone crushing operation standards**

Emission ID	Emission Process	Standard (lb/hr)
TC1, TC2	Transfer Conveyor	52.28
TC5	Transfer Conveyor	46.79
TC3, TC4	Transfer Conveyor	43.12
TC6 – TC10, TC12 – TC21, TC27 – TC29	Transfer Conveyors	40.41

<sup>5</sup> The potential uncontrolled PM emissions of each piece of equipment cannot exceed the emission limits in the table.



<b>Emission ID</b>	<b>Emission Process</b>	<b>Standard (lb/hr)</b>
TC11, WC-2, WC-3	Transfer Conveyors	38.59
WC-1, TC22, TC23	Transfer Conveyors	36.17
TC24 – TC26	Transfer Conveyors	32.37
SC1	Scalping Screen	52.28
SC2	Finishing Screen	46.79
SC3	Finishing Screen	45.15
SC5	Wash Screen	40.41
SC6	Bivi-Tec Screen	38.59
CR1	Crusher	45.15
CR2	Crusher	40.41
B1 – B10	Storage Bins	36.17

## **S2. Monitoring and Record Keeping**

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

### **a. Opacity**

- i. The owner or operator shall monthly perform periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system. The owner or operator must initiate corrective action within 24 hours and complete corrective action as expediently as practical if the owner or operator finds that water is not flowing properly during an inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under 40 CFR 60.676(b). [40 CFR 60.674(b)]
- ii. The owner of operator must record each periodic inspection required to check that water is flowing to discharge spray nozzles in the wet suppression system, including dates and any corrective actions taken, in a logbook (in written or electronic format). The owner or operator must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the District upon request. [40 CFR 60.676(b)]
- iii. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points (TC1, TC2, TC3, TC4, TC5, TC6, TC6a, TC7 – TC10, TC12 – TC21, TC27 – TC29, TC11, WC-2, WC-3, WC-1, TC22, TC23, TC24 – TC26, SC1, SC2, SC3, SC5, SC6, CR1, CR2, and B1 – B10). No more than four emission

processes shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

- iv. At emission processes where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.
- v. The owners or operators shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission process is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**b. PM/PM<sub>10</sub>**

- i. See Plantwide Emission unit

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

**a. Opacity**

- i. Identification of all periods when the wet dust suppression system was offline and the process was in operation;
- ii. Any deviation from the requirement to perform monthly visible emission (VE) surveys;
- iii. Any deviation from the requirement to record the results of each VE survey,
- iv. The number, date, and time of each VE survey where visible emissions were observed;
- v. Identification of all periods of exceedance of the opacity standard; and
- vi. Description of any corrective action taken for each exceedance.

**b. PM/PM<sub>10</sub>**

- i. See Plantwide Emission unit.

### Emission Unit U2: Underground Equipment

#### Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	Title	Applicable Sections
7.08	Standards of Performance for New Process Operations	1, 2, 3.1.1, 3.3.1

#### Equipment<sup>6</sup>

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
CUG1 – CUG8	Eight (8) Transfer Conveyors, 1,000 ton per hour each	2005	7.08	C1	S-1
CRUG	Primary Crusher, 1,000 ton per hour	2005			

#### Control Devices

Control ID	Description	Control Efficiency
C1	Wet suppression system	90%

<sup>6</sup> All equipment is located underground, therefore 40 CFR 60 OOO does not apply. [40 CFR 60.670(a)(2)]

## U2 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. Opacity

- i. The owner or operator shall not allow visible emissions of the emissions points vented through S-1<sup>7</sup> to equal or exceed 20% opacity.  
[Regulation 7.08, section 3.1.1]

#### b. PM/PM<sub>10</sub>

- i. See Plantwide Emission Unit.
- ii. The owner or operator shall not allow PM emissions to exceed the following pound per hour standards for each piece of equipment based on actual operating hours in a calendar day. See Table 2.<sup>8</sup>  
[Regulation 7.08, section 3.1.2]

**Table 2 – Underground Equipment operation standards**

Emission ID	Emission Process	Standard (lb/hr)
CUG1 – CUG8	Transfer Conveyor	52.28
CRUG	Primary Crusher	52.28

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. Opacity

- i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey of S-1, during normal operation, of the emission process. No more than four emission processes shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission processes where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall

<sup>7</sup> Stack S1 is the release point for all the underground mining equipment.

<sup>8</sup> The potential uncontrolled PM emissions of each piece of equipment cannot exceed the emission limits in the table.

perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

- iii. The owners or operators shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission process is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**b. PM/PM<sub>10</sub>**

- i. See Plantwide Emission unit

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report

**a. Opacity**

- i. For emission points vented through stack ID S-1:
  - (1) Any deviation from the requirement to perform monthly visible emission (VE) surveys;
  - (2) Any deviation from the requirement to record the results of each VE survey;
  - (3) The number, date, and time of each VE survey where visible emissions were observed;
  - (4) Identification of all periods of exceedance of the opacity standard; and
  - (5) Description of any corrective action taken for each exceedance.

**b. PM/PM<sub>10</sub>**

- i. See Plantwide Emission unit.

**Emission Unit U3: Parts Washer****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
6.18	Standards of Performance for Solvent Metal Cleaning Equipment	1, 2, 3, 4.1, 4.2

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
P1	One (1) Cold Solvent Parts Washer (Maintenance Area), capacity 30 gallons <sup>9</sup>	2005	6.18	N/A	Fugitive

**Control Devices**

There are no control devices associated with this unit.

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<sup>9</sup> This equipment does not have a secondary reservoir.

### U3 Specific Conditions

#### S1. Standards

[Regulation 2.17, section 5.1]

##### a. VOC

- i. The owner or operator shall install, maintain, and operate the control equipment as follows: [Regulation 6.18, section 4]
  - (1) The cold cleaner shall be equipped with a tightly fitting cover that is free of cracks, holes, or other defects. If the solvent is agitated or heated, then the cover shall be designed so that it can be easily operated with 1 hand. [Regulation 6.18, section 4.1.1]
  - (2) The cold cleaner shall be equipped with a drainage facility that is designed so that the solvent that drains off parts removed from the cleaner will return to the cold cleaner. The drainage facility may be external if the District determines that an internal type cannot fit into the cleaning system. [Regulation 6.18, section 4.1.2]
  - (3) A permanent, conspicuous label summarizing the Operating Requirements specified in section 4.2 of this Regulation shall be installed on or near the cold cleaner. [Regulation 6.18, section 4.1.3]
  - (4) If used, the solvent spray shall be a fluid stream, not a fine, atomized, or shower type spray, at a pressure that does not cause excessive splashing. Flushing of parts using a flexible hose or other flushing device shall be performed only within the freeboard area of the cold cleaner. Solvent flow shall be directed downward to avoid turbulence at the air-solvent interface and to prevent solvent from splashing outside of the cold cleaner. [Regulation 6.18, section 4.1.4]
  - (5) Work area fans shall be located and positioned so that they do not blow across the opening of the cold cleaner. [Regulation 6.18, section 4.1.6]
  - (6) The solvent-containing portion of the cold cleaner shall be free of all liquid leaks. Auxiliary cold cleaner equipment such as pumps, water separators, steam traps, or distillation units shall not have any visible liquid leaks, visible tears, or cracks. [Regulation 6.18, section 4.1.8]
- ii. The owner or operator shall observe at all times the following operating requirements: [Regulation 6.18, section 4.2]
  - (1) Waste solvent shall neither be disposed of nor transferred to another party in a manner such that more than 20% by weight of the waste solvent can evaporate. Waste solvent shall be stored only in a covered container. A covered container may contain a device that

allows pressure relief, but does not allow liquid solvent to drain from the container. [Regulation 6.18, section 4.2.1]

- (2) The solvent level in the cold cleaner shall not exceed the fill line. [Regulation 6.18, section 4.2.2]
  - (3) The cold cleaner cover shall be closed whenever a part is not being handled in the cold cleaner. [Regulation 6.18, section 4.2.3]
  - (4) Parts to be cleaned shall be racked or placed into the cold cleaner in a manner that will minimize drag-out losses. [Regulation 6.18, section 4.2.4]
  - (5) Cleaned parts shall be drained for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [Regulation 6.18, section 4.2.5]
  - (6) A spill during solvent transfer shall be cleaned immediately, and the wipe rags or other sorbent material shall be immediately stored in a covered container for disposal or recycling, unless enclosed storage of these items is not allowed by fire protection authorities. [Regulation 6.18, section 4.2.6]
  - (7) Sponges, fabric, wood, leather, paper products, and other absorbent material shall not be cleaned in a cold cleaner. [Regulation 6.18, section 4.2.7]
- iii. The owner or operator shall not operate a cold cleaner using a solvent with a vapor pressure that exceeds 1.0 mm Hg (0.019 psi) measured at 20°C (68°F). [Regulation 6.18, section 4.3.2]

## **S2. Monitoring and Record Keeping**

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

### **a. VOC**

- i. The owner or operator shall maintain records that include the following for each purchase: [Regulation 6.18, section 4.4.2]
  - (1) The name and address of the solvent supplier,
  - (2) The date of the purchase,
  - (3) The type of the solvent, and



- (4) The vapor pressure of the solvent measured in mm Hg at 20°C (68°F).
- ii. All records required Regulation 6.18, section 4.4.2 shall be retained for 5 years and made available to the District upon request.  
[Regulation 6.18, section 4.4.3]

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report in accordance with General Condition G12.

### Off-Permit Documents

Rogers Group, Inc. has prepared a Fugitive Dust Control Plan that was incorporated in the previous FEDOOP operating permit, 27662-14-F(R1). This document is no longer included as a permit appendix and is now maintained separately.

### Insignificant Activities

Equipment	Qty.	PTE (tpy)	Regulation Basis
Diesel and Waste Oil Tanks (See Emission Unit IA1)	3	0.04 (VOC)	Regulation 1.02, section 1.38
Shop Heater utilizing waste oil generated on site	1	0.84 (PM <sub>10</sub> )	Regulation 1.02, section 1.38

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

**Emission Unit IA1: Tanks****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.12	Standard of Performance for New Storage Vessels for Volatile Organic Compounds	all

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
T1	One (1) 350 gallon waste oil workbench tank	1995	7.12	N/A	Fugitive
T2	One (1) 500 gallon waste oil tank	1995	7.12	N/A	Fugitive

**Control Devices**

There are no control devices associated with this unit.

## IA1 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. VOC

- i. The owner or operator of T1 and T2 shall not store materials with an as stored vapor pressure of greater than or equal to 1.5 psia in the storage vessel(s), unless the storage tank is equipped with a permanent submerged fill pipe.

[Regulation 7.12, section 3.3]

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. VOC

- i. The owner or operator of the storage vessel(s) shall maintain records of the material stored and the vapor pressure in each storage vessel and if the contents of the storage vessel(s) are changed a record shall be made of the new contents, the date of the change, and the new vapor pressure in order to demonstrate compliance with VOC standards.
- ii. The owner or operator shall keep a record that shows if the storage vessel is equipped with a submerged fill pipe. Submerged fill pipe means any fill pipe the discharge of which is entirely submerged when the liquid level is 6 inches above the bottom of the tank; or when applied to a tank which is loaded from the side, shall mean every fill pipe the discharge opening of which is entirely submerged when the liquid level is 2 times the fill pipe diameter above the bottom of the tank.

### S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report in accordance with General Condition G12.

**Fee Comment**

The source is required to pay annual fees.

### Attachment A – Default Emission Factors, Calculation Methodologies, & Stack Tests

Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

**Table 3 - Default PM Emission Factors**

Equipment	Emission Point	PM Emission Factor	Determination Method
Transfer Conveyors	TC1, TC2	PM 0.003 lb/ton PM <sub>10</sub> 0.0011 lb/ton	AP-42 Emission Factors from Chapter 11.19, Section 2
Transfer Conveyors	TC5		
Transfer Conveyors	TC3, TC4		
Transfer Conveyors	TC6-TC10, TC12-TC21, TC27-TC29		
Transfer Conveyors	TC11, WC-2, WC-3		
Transfer Conveyors	WC-1, TC22, TC23		
Transfer Conveyors	TC24-TC26		
Transfer Conveyors	CUG1 – CUG8		
Scalping Screen	SC1	PM 0.025 lb/ton PM <sub>10</sub> 0.0087 lb/ton	
6’x20’ TD Finishing	SC2		
6’x20’ TD Finishing	SC3		
Wash Screen	SC5		
6’x20’ Bivi-Tec Screen	SC6		
Secondary Crusher	CR1	PM 0.0054 lb/ton PM <sub>10</sub> 0.0024 lb/ton	
Tertiary Crushers	CR2		
Primary Crusher	CRUG		
Storage Bins	B1-B10		

**Table 4 - Default VOC Emission Factors**

Equipment	Emission Point	VOC Emission Factor	Determination Method
Tanks	T1-T3	MSDS/SDS content	Mass balance calculation
Parts washer	P1	MSDS/SDS content	Mass balance calculation

**Table 5 - Control Devices**

<b>U1 Control Devices</b>			
<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>	<b>Basis</b>
C1	Wet suppression system	90%	District Approved